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August 12, 2022

Ex Parte

Via ECF

Honorable Raymond J. Dearie
Senior United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: United States v. Shelton, et al.
18-CR-609 (S-3)(RJD)

Dear Judge Dearie:

As the Court is aware, I represent Mr. Himen Ross in the above referenced matter scheduled for trial commencing April 16 with jury selection.

I am respectfully requesting that during the duration of the testimonial phase of the trial I be permitted to book a hotel so that I can avoid the stress and expense of travel to and from my home each day of trial. On a typical court day, I travel to and from my home in the Bronx, a trip that can take anywhere from one (1) to two (2) hours each way depending on traffic. At CJA rates (\$158 per hour) that totals between \$316.00 and \$632.00 per each day of trial. The trip is exhausting, and the time better spent in trial preparation.

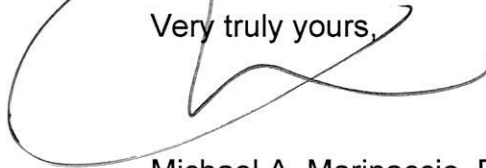
MICHAEL A. MARINACCIO, ESQ.

I have investigated several hotels in the area of the courthouse and noted that the closest is the Marriott Brooklyn Bridge at 333 Adams Street, Brooklyn, New York 11201. I have contacted the hotel and have been advised that the best rate with all the discounts applied (government rate, my member discount, etc.) is \$220.00 per night plus tax. What I propose is to check in the night before the first day of trial for the week of trial and check out the last day of the trial for that week (e.g. check-in Sunday night and check-out Thursday for a four night stay during a typical Monday through Thursday trial week). To the extent possible I would book the room in advance depending on the particular week's trial schedule.

I have discussed this proposal with Mr. Alan Nelson, the Second Circuit budget director for the CJA program, and he agrees it makes economic sense.

Accordingly, I respectfully request that the Court approve this request.

Very truly yours,

A handwritten signature in black ink, appearing to be 'MAM', with a large, sweeping loop at the end.

Michael A. Marinaccio, Esq.

MAM/jm.